

# Akin Gump

STRAUSS HAUER & FELD LLP

APPLICATION GRANTED  
SO ORDERED 

VERNON S. BRODERICK

January 14, 20

U.S.D.J. 1/16/2019

VIA ECF

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: MDL 1358 / MTBE, New Jersey Department of Environmental Protection, et  
al. v. Atlantic Richfield Co., et al., No. 1:08-cv-00312-VSB

Dear Judge Broderick:

We represent newly-added defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil ("newly-added Lukoil Defendants"), which entities were added as Defendants in the above-referenced litigation by the Court's Order of September 28, 2018, granting leave to file a Fifth Amended Complaint.

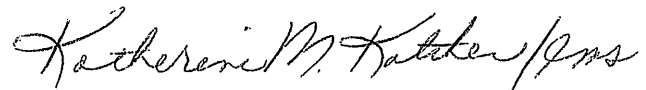
The newly-added Lukoil Defendants respectfully request an extension of time through January 22, 2019, in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., represented by Matthew G. Parisi of Bleakley Platt & Schmidt, LLP, join in this request for an extension.

We have conferred with counsel for Plaintiff, and they have no objection to this extension.

The Parties have signed the enclosed stipulation, and we respectfully request your signature on the enclosed "Stipulation and [Proposed] Order."

Respectfully,



Katherine M. Katchen

Enclosure

cc: All Counsel of Record (via LNFS)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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*In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation*

**Master File No. 1:00 – 1898  
MDL 1358 (VSB)**

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**This Document Relates to:**

*New Jersey Department of Environmental Protection, et al. v.  
Atlantic Richfield Co., et al., No. 1:08-CV-00312-VSB*

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**STIPULATION AND [PROPOSED] ORDER**

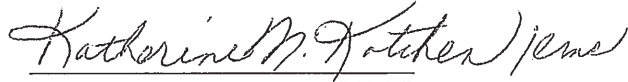
On or about September 28, 2018, the Court granted Plaintiffs' Unopposed Motion for Leave to File a Fifth Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, newly-added Defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil (collectively the "newly-added Lukoil Defendants"), and existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., that the newly-added Lukoil Defendants, Lukoil Americas Corporation and Getty Petroleum Marking Inc. shall have until January 22, 2019 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: January 14, 2019

AGREED TO BY:

AKIN GUMP STRAUSS HAUER & FELD LLP



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*Counsel for Newly-Added Lukoil Defendants*

MILLER & AXLINE, P.C.



DUANE C. MILLER

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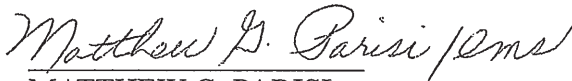
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*Counsel for plaintiff*

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(914)949-2700

*Counsel for Lukoil Americas Corporation & Getty Petroleum Marketing Inc.*

SO ORDERED,

Dated: \_\_\_\_\_, 2019

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HON. VERNON S. BRODERICK